

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., et al.,**

**Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**AD HOC GROUP OF HOSPITALS MOTION FOR LEAVE TO EXCEED  
THE PAGE LIMIT IN FILING THE REPLY TO THE UNITED STATES  
TRUSTEE'S OBJECTION TO THE FEE SETTLEMENTS INCLUDED IN  
SIXTH AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION  
OF PURDUE PHARMA L.P. AND ITS AFFILIATED DEBTORS**

The Ad Hoc Group of Hospitals (the “Hospitals”), through its counsel, Taft Stettinius & Hollister LLP, respectfully submit this motion (the “Motion”) for leave to exceed the page limit in filing its reply (the “Reply”) to the *Objection of United States Trustee to Sixth Amended Joint Chapter 11 Plan of Purdue Pharma, L.P. and its Affiliated Debtors* (the “UST Objection”) [Docket No. 3256]. In support of the Motion, the Hospitals respectfully state as follows:

**MOTION**

1. Notwithstanding the highly contested nature of the Chapter 11 Cases, only the United States Trustee filed an objection to the attorney fee provisions in the Plan, necessitating the filing of the Reply to the UST Objection.

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

2. The *Second Amended Order Establishing Certain Notice, Case Management, and Administrative Procedures*, entered on November 18, 2019 [Docket No. 498] (the “CMO”), provides that “[u]nless granted prior permission...replies and statements are limited to 20 pages.” CMO at Ex. 1, ¶ 15.

3. The Hospitals submit that allowing the Reply to exceed twenty pages is appropriate and justified. Due to the complexity of the Plan and issues raised in the UST Objection, the Reply and supporting exhibits describe the extensive efforts it took to reach is groundbreaking results in the Plan. Consequently, the Reply exceeds the page limit restriction in the CMO.

4. The Reply itself is only 15 pages (exclusive of the certificate of service), but there are also two Declarations which aggregate 34 pages, for a total of 49 pages. The Hospitals are unable to provide the Court with the information necessary for the full and fair adjudication of the issues raised in the UST Objection if it were to remain subject to the twenty-page limitation.

**CONCLUSION**

For the above reasons, the Hospitals respectfully submit that this Bankruptcy Court grant the Hospitals leave to file the Reply in excess of twenty pages.

Dated: August 5, 2021  
New York, New York

TAFT STETTINIUS & HOLLISTER LLP

By: /s/ Michael P. O'Neil  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2021 I caused a copy of the foregoing *AD HOC GROUP OF HOSPITALS MOTION FOR LEAVE TO EXCEED THE PAGE LIMIT IN FILING THE REPLY TO THE UNITED STATES TRUSTEE'S OBJECTION TO THE FEE SETTLEMENTS INCLUDED IN SIXTH AMENDED JOINT CHAPTER 11 PLAN OF REORGANIZATION OF PURDUE PHARMA L.P. AND ITS AFFILIATED DEBTORS**MOTION FOR LEAVE TO EXCEED* to be electronically filed and served via the United States Bankruptcy Court for the Southern District of New York's CM/ECF system upon the following parties in this case:

(See attached list)

/s/ Michael P. O'Neil  
Michael P. O'Neil

## Mailing Information for Case 19-23649-rdd – August 5, 2021

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